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PACIFIC X TELESIS
Group - Washington

July 29, 1993

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

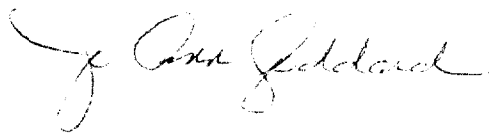
Dear Mr. Caton:

Re: *CC Docket No. 93-162 (DA 93-951) - Local Exchange Carriers' Rates, Terms, and Conditions for Expanded Interconnection for Special Access*

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "*Motion To Extend Time To File Direct Cases And To File Rebuttals*" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

No. of Copies rec'd
List A B C D E

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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JUL 29 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Local Exchange Carriers' Rates,)	DA 93-951
Terms, and Conditions for)	CC Docket No. 93-162
Expanded Interconnection for)	
Special Access)	
)	

MOTION TO EXTEND TIME TO FILE DIRECT CASES
AND TO FILE REBUTTALS

Pacific Bell and Nevada Bell, pursuant to Section 1.46(c) of the Commission's Rules,¹ respectfully request a 32 day extension of time for filing our direct cases. The Common Carrier Bureau's Order Designating Issues For Investigation ("Order") released July 23, 1993, requires local exchange carriers to file their direct cases on August 13, 1993. With a 32 day extension, direct cases would be due on September 14, 1993. In addition, Pacific Bell and Nevada Bell request an extension to file rebuttals 30 days after oppositions or comments are due. The Order provides 10 days. In support of these requests, Pacific Bell and Nevada Bell state the following.

The Order designates 16 issues, with numerous subissues, for investigation, and almost all these issues

Pacific Bell and Nevada Bell. Issue A, alone, requires extensive data and explanations concerning rate levels. In order to provide the Tariff Review Plan which is required for this issue, we will have to breakdown our cost data by

By itself, the amount of work involved in preparing our direct cases makes the current amount of time allowed for our direct cases inadequate and warrants the extension of time that we request. In addition, the knowledge needed to prepare our direct cases resides in a limited number of key personnel who are involved simultaneously in other Commission and state proceedings that require their expertise for filings that are due during August. Certain of these personnel will be working on the report due August 12, 1993, in CC Docket 85-166.³ Certain of these personnel also will be extensively involved with the California Public Utilities Commission's ("CPUC's") rulemaking concerning open access and network architecture. The CPUC has placed this matter on its agenda for August 4, 1993, at which time it intends to consider an order proposing expanded interconnection and switched transport competition.

Pacific Bell and Nevada Bell also request an extension of time to file our rebuttals to oppositions to, or comments on, our direct cases. Given the large number of issues being investigated and the extensive data that we will file, we anticipate that numerous parties will file expansive oppositions or comments, to which we will need to respond. That this will be the case is evidenced by the

³ Investigation of Special Access Tariffs of Local Exchange Carriers, CC Docket No. 85-166, Phase II Part I and Phase III Part I, Memorandum Opinion And Order, released July 12, 1993.

earlier filings in this proceeding. Petitions to reject LEC tariffs were filed by nine parties, and some of the petitions were voluminous. The number of petitioners in this proceeding is greater than the number usually involved in a tariff proceeding. The current 10 days allowed for rebuttals is inadequate for a proceeding of this magnitude, and the 30 days which we request is reasonable. Adjusting the pleading cycle as we request will provide a balanced and fair structure. The current schedule allows parties 28 days to file oppositions or comments on the LECs' direct cases, but allows the LECs only 10 days for rebuttals.

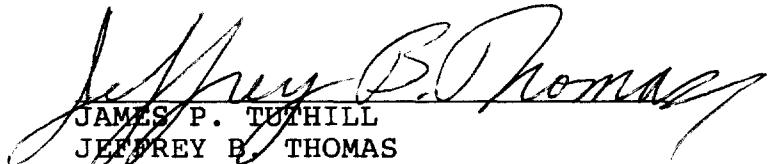
No party will be prejudiced by the extensions which we request. The Bureau issued an accounting order with respect to the LECs' tariffs, and thus all parties are protected in the event that rate adjustments are ordered as a result of the investigation. An extension of time will allow parties to build a record from which the Bureau can make determinations that are in the public interest.

For the above reasons, Pacific Bell and Nevada Bell respectfully request an extension of time to file our

direct cases until September 14, 1993 and to file rebuttals
30 days after oppositions or comments are due.

Respectfully submitted,

PACIFIC BELL
NEVADA BELL


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Date: July 29, 1993

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

JUL 29 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE CLERK

In the Matter of)
)
Local Exchange Carriers' Rates,) DA 93-951
Terms, and Conditions for) CC Docket No. 93-162
Expanded Interconnection for)
Special Access)
_____)

ORDER GRANTING MOTION TO EXTEND TIME

For good cause shown, Pacific Bell's and Nevada
Bell's Motion for an Extension of Time to File Direct Cases
until September 14, 1993 and to File Rebuttals 30 days after

Certificate of Service

I, Denice Harris, on behalf of Pacific Bell, do hereby certify that I caused a copy of its foregoing "Motion To Extend Time To File Direct Cases And To File Rebuttals" in connection with CC Docket No. 93-162, to be served to the parties indicated on the attached Service List by United States mail, postage prepaid, on this 29th day of July, 1993.



Denice Harris

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93-162

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